

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 722
DOCKET NO. G-9, SUB 781
DOCKET NO. G-9, SUB 786

In the Matter of

Docket No. G-9, Sub 722)
)
Consolidated Natural Gas Construction and)
Redelivery Services Agreement Between Piedmont)
Natural Gas Company, Inc., and Duke Energy)
Carolinas, LLC)
)
Docket No. G-9, Sub 781)
)
Application of Piedmont Natural Gas Company, Inc.)
for an Adjustment of Rates, Charges, and Tariffs)
Applicable to Service in North Carolina)
)
Docket No. G-9, Sub 786)
)
Application of Piedmont Natural Gas Company, Inc.)
for Modifications to Existing Energy Efficiency)
Programs and Approval of New Energy Efficiency)
Programs)

**MOTION FOR EXTENSION
OF TIME**

Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”) hereby moves the Commission for a four (4) business day extension of the time in which it may file an agreed form of EE mechanism with the Commission as contemplated in paragraph III.AA.2.a of the Stipulation of Partial Settlement (“Stipulation”) filed in this proceeding on September 7, 2021. In support of this motion, Piedmont respectfully shows unto the Commission the following:

1. On September 7, 2021, on behalf of the Public Staff – North Carolina Utilities Commission (“Public Staff”), Carolina Utility Customers Association, Inc. (“CUCA”), and Carolina Industrial Group for Fair Utility Rates IV (“CIGFUR IV”) (collectively the “Stipulating Parties”), Piedmont filed the Stipulation in the above-captioned dockets resolving many of the issues before the Commission.

2. Paragraph No. III.AA.2.a of the Stipulation states that within ten (10) business days of filing the Stipulation, “Piedmont and the Public Staff will file with the Commission a Mechanism to (1) allow Piedmont to recover all reasonable and prudent costs incurred for adopting, implementing, and operating cost-effective EE measures and programs and (2) establish certain requirements for requests by Piedmont for approval and continued operation of EE programs consistent with the provisions for the piloting of Piedmont's EE programs...”

3. Piedmont and the Public Staff are in the process of finalizing such a mechanism to comply with the Stipulation, but have not been able to finalize a mechanism at this time.

4. The Company and the Public Staff commit to filing a mechanism in compliance with Paragraph No. III.AA.2.a of the Stipulation on, or before, Monday, September 27, 2021.

5. Based on the foregoing, the Company respectfully requests that the Commission grant a four (4) business day extension of time to allow Piedmont and the Public Staff to complete a mechanism that complies fully with Paragraph No. III.AA.2.a of the Stipulation.

6. Piedmont has conferred with Public Staff counsel regarding this request and has been informed that the Public Staff joins in the request for relief set forth herein. Piedmont has also sought input from CUCA and CIGFUR IV, the other Stipulating Parties, and is authorized to represent that CUCA and CIGFUR IV do not object to the relief sought herein contingent upon the preservation of their respective reservation of rights contained in the Stipulation with regard to this filing.

WHEREFORE, Piedmont respectfully requests that the Commission grant a four (4) business day extension of time in order to file documents in compliance with Paragraph No. III.AA.2.a of the Stipulation.

Respectfully submitted, this the 21st day of September, 2021.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 21st day of September, 2021.

/s/ Richard K. Goley
Richard K. Goley